

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

15-CR-149-A

FRANK R. PARLATO, JR.,

Defendant.

**GOVERNMENT’S MOTION TO
PARTIALLY SEAL RESPONSE TO PETITIONER’S
MOTION FOR DISCLOSURE OF GRAND JURY MATERIALS**

The government moves to partially seal its response to petitioner’s motion to disclose Clare Bronfman’s grand jury testimony. *See* Dkt. 383. In drafting its response to the petition, the government has identified certain “grand-jury matters,” Fed. R. Crim. P. 6(e)(3)(E), that must be discussed in its response but which are not public. Federal Rule of Criminal Procedure 6(e)(6) requires that “[r]ecords . . . related to grand-jury proceedings . . . be kept under seal to the extent and as long as necessary to prevent the unauthorized disclosure of a matter occurring before a grand jury.”

The government therefore moves to seal and file *ex parte* those portions of its response that reference a “matter occurring before a grand jury,” *id.*, and which are not otherwise public. The government will publicly file a redacted copy of its response and will file, *ex parte* and under seal, an unredacted copy of its response.

DATED: Buffalo, New York, February 27, 2024

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